

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

KEENAN T. KNIGHT,

Plaintiff,

Case No. 23-CV-886-PP

vs.

LT. AVERY, OFFICER TAYLOR, and
OFFICER T.E. WILLIAMS,

Defendants.

DEPOSITION OF KEENAN T. KNIGHT

Deposition of KEENAN T. KNIGHT, taken
before me at Green Bay Correctional Institution,
Green Bay, Brown County, Wisconsin, on the 16th
day of April, 2024, A.D., otherwise than as a
witness on the trial, wherein the parties thereto
are as set forth above.

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APPEARANCES

MR. DALE NIKOLAY

Assistant Corporation Counsel at
Milwaukee County

901 North 9th Street, Room 303

Milwaukee, Wisconsin 53233

appeared on behalf of the Defendants.

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**Original exhibits placed with
original transcript**

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1 Said KEENAN T. KNIGHT, having been
2 first duly sworn by me to testify the truth,
3 the whole truth, and nothing but the truth
4 relative to said cause, in answer to oral
5 interrogatories, deposed and made answer as
6 follows:

7 - - - - -

8 (The examination began at 1:12 p.m.
9 on April 16th, 2024.)

10 EXAMINATION

11 BY MR. NIKOLAY:

12 Q State your name, please.

13 A Keenan Knight.

14 Q How old are you, Mr. Knight?

15 A Thirty-four.

16 Q Can you detail for me your educational
17 background, please?

18 A I have a GED and some college-level
19 education.

20 Q Where did you get your GED?

21 A Boscobel, Wisconsin.

22 Q Did you get that while you were
23 incarcerated?

24 A Yes.

25 Q Your college credits, where did you pick

1 those up?

2 A Danville Area College in Illinois.

3 Q D-A-N-N-V-I-L-L-E or one N?

4 A D-A-N-V-I-L-L-E.

5 Q Okay. How many credits do you have?

6 A Approximately 30. Thirty, 35 maybe.

7 Q In what subjects?

8 A General studies and also certificate --
9 certification for the study of maintenance.

10 Q I'm sorry, I didn't catch that. In what?

11 A Custodial maintenance.

12 Q So that was a technical college?

13 A Yes.

14 Q Were you living down in Illinois at the
15 time?

16 A Yes.

17 Q We're here because of a lawsuit that you
18 filed that stems from your time at Milwaukee
19 County Jail and your interaction with some
20 officers in the jail. The questions I'm
21 going to ask you are going to be about what
22 happened there. And if at any point you
23 don't understand a question that I'm asking
24 you, just ask me to rephrase it for you.
25 Okay?

1 A All right.

2 Q You have some papers in front of you and we
3 were chatting a little bit off the record
4 about what they were. You had indicated
5 that they were some responses that we had
6 provided you to discovery you've sent us,
7 the complaint, the screening order, and also
8 some notes. Did you review those documents
9 to prepare you to testify today?

10 A Yes.

11 Q Okay. I'm really interested in the notes
12 that you wrote. Can you pull those out for
13 me, please?

14 A (Witness complies with request.)

15 Q How many pages are there?

16 A Nine.

17 Q And can you tell me when you authored those
18 notes?

19 A There is no date actually on these notes.
20 However, I did author these notes upon
21 receiving discovery and going over the
22 response to the discovery that you sent me.

23 Q So those notes were all done, the nine pages
24 we just talked about, they were all done
25 after this lawsuit was filed; is that

1 accurate?

2 A Yes.

3 Q Do you have any notes that you authored
4 shortly after the events of this lawsuit?

5 A Meaning?

6 Q Did you take notes about what happened
7 within the weeks after this incident that
8 we're here about?

9 A No. Everything that was -- everything was
10 placed in the complaint that I initially
11 filed.

12 Q Fair enough. So you were involved in a
13 decentralization and you were tased while in
14 Milwaukee County Jail, and that forms the
15 basis of this lawsuit, correct?

16 A Yes.

17 Q So is it okay if we talk about the incident
18 and we'll both know that we're talking about
19 your incident with the taser?

20 A Yes.

21 Q And do you know what date that incident
22 occurred?

23 A May 31st, 2023.

24 Q Okay. So then for shorthand, we'll just
25 refer to it as the incident. Okay?

1 A Okay.

2 Q How long had you been in Milwaukee County
3 Jail before May 31st, '23, when this
4 incident occurred?

5 A I was arrested December 2nd of 2021, so I
6 would have had arrived at Milwaukee County
7 Jail maybe approximately December 5th, due
8 to being held at the police station during
9 the time in between. So I would have
10 arrived at the County actually probably
11 December 5th, --

12 Q Of '21.

13 A -- 2021.

14 Q So you were there for a considerably long
15 time; part of that was due to COVID and the
16 backlog that created in the system, --

17 A Yes.

18 Q -- I take it?

19 A Yes.

20 Q What were your charges?

21 A Armed robbery, firearms, fleeing/eluding,
22 second degree reckless endangerment, and
23 bail jumping.

24 Q Serious charges.

25 A Yeah.

1 Q What was your bail set at?

2 A 200,000.

3 Q Hence the time you were with -- in the jail
4 as a result, correct?

5 A Yes.

6 Q Did you enter a plea?

7 A Yes.

8 Q And how long is your sentence?

9 A Twelve years and -- it was 20 years. Twelve
10 years prison, eight years extended
11 supervision.

12 Q And I'm sorry. I asked you earlier on and I
13 forgot already. How old are you?

14 A Thirty-four.

15 Q Do you have family?

16 A Yes.

17 Q Have any kids?

18 A One.

19 Q How old?

20 A Sixteen.

21 Q Boy or girl?

22 A Boy.

23 Q Is he into sports?

24 A Yes.

25 Q What's he play?

1 A Football.

2 Q You play football when you were a kid?

3 A Yeah, I played several sports; football,
4 softball, volleyball, a little soccer.

5 Q Where'd you go to high school?

6 A I didn't attend high school.

7 Q Okay. So these sports you played were
8 either before that or outside of the --

9 A Yes.

10 Q -- school setting.

11 A Yes.

12 Q Which one, both?

13 A Both.

14 Q Okay. Can you detail for me your employment
15 history?

16 A Before I was incarcerated, I was working for
17 a temp service for the City of Milwaukee
18 doing waste management. I was self-employed
19 for a while, barbering. Prior to that I did
20 construction, general labor and
21 construction, and I've done seal coating in
22 construction.

23 Q Have you had training since you -- well, you
24 haven't been here that long; I don't imagine
25 you've had any training since you've been

1 here.

2 A No.

3 Q Plan on getting any educational training or
4 vocational training while you're here if it
5 becomes available to you?

6 A Yes. I'm interested in taking welding.

7 Q Taking welding.

8 A Yeah.

9 Q It's an excellent profession. High paying
10 these days, if you can weld stainless steel.
11 Have you done any of that kind of work
12 before?

13 A Not officially.

14 Q So tell me what led up to your confrontation
15 with the officers that led to this incident.

16 A As I described in the complaint, there was
17 -- we were on the unit, officer did his
18 rounds, smelled smoke on the unit by the
19 visiting area. Ordered everybody to lock
20 in. At that point I went to my cell. I was
21 inside my cell. Called the supervisor, and
22 at some point after that, he came over the
23 intercom and told me that I had a lawyer
24 visit, an attorney visit.

25 Q Okay. And this was the housing officer that

1 came on your intercom?

2 A Yeah. The Officer Saavedra, not a part of
3 the lawsuit, but that was the officer that
4 was working on the unit that day.

5 Q Do you know how that officer's name is
6 spelled, for the court reporter?

7 A S-A-A-V-E-D-R-A.

8 Q Thank you. So they come on the intercom and
9 tell you you've got an attorney visit, and
10 I'm assuming that wasn't something you were
11 expecting, right?

12 A Actually, my attorney was supposed to come
13 to visit me the day before, so I figured
14 that it's plausible, okay, he -- he didn't
15 come the day before so he came today. So I
16 came out my cell, went out, went out the
17 unit, and there was, I believe, Deputy Paul
18 Rivera (phonetic spelling), I believe. I
19 may be mistaken. But he attempted to put me
20 in the visiting booth, but I didn't see my
21 attorney sitting there, which would be
22 custom that before they bringed [sic] us
23 out, the attorneys are already sitting in
24 there. So I stated to him, where's my
25 attorney. He said that he's coming up. So

1 at that point I said, no, this is not how
2 that works. My attorney should already be
3 here. I wanna go back to my cell. And at
4 that point, he continued telling me, well,
5 just go in, he's coming up. I said, no, if
6 he is here, tell him I refuse the visit.
7 He can come see me again another time. At
8 that --

9 Q Okay. So what are you thinking at that
10 point?

11 A My attorney not here and this is -- this is
12 something else. I wasn't sure what it was,
13 but --

14 Q So you thought that it was a ruse that your
15 attorney was there, or something was up?

16 A I just -- I just knew that any other time
17 that I've came to see my attorney, that
18 typically when you come out the unit,
19 they're already sitting in the attorney
20 booth on the other side, or unless it's a
21 contact visit, they're already sitting in
22 the room. It's not they policy to pull you
23 out your cell and then you waiting for your
24 attorney to come. So seeing that my
25 attorney wasn't there, like, nah, I'm okay,

1 I don't -- I don't want the attorney visit.
2 I'd rather go back to my room.

3 Q So unlike when we came here today and you
4 were already sitting in this room we're now
5 in, it was your experience at the jail that
6 the attorneys get put in the room first and
7 then the occupant is brought, and that had
8 been your experience before that day.

9 A Right.

10 Q Okay. So did you end up going in the
11 visiting room eventually?

12 A At that point, Lieutenant Avery came out and
13 said, well, no, there is no attorney visit.
14 We're here. We're gonna be conducting a
15 cell search. We need you to go in -- go in
16 the visiting booth so --

17 Q Okay. So how'd you respond to that?

18 A At that point I went in the -- I went in the
19 visiting booth. And at that point they went
20 on the unit and I sat in the visiting booth
21 for a while.

22 Q Okay. So did you voluntarily go into the
23 visiting booth or did they have to order you
24 to go into the visiting booth?

25 A She asked me to go in the visiting booth for

1 -- a couple times, and I told her that, you
2 know, I wanna go back to my cell. This is
3 not an attorney visit. Y'all told me that I
4 have an attorney visit. My attorney is not
5 here, so I wanna go back to my cell. And at
6 that point, that's when she eventually
7 telling me that like, well -- you know,
8 well, we -- we're here, and the reason we
9 need you to go in here is because they're
10 gonna search your cell. So eventually I
11 went -- I went in with -- I mean, I was
12 compliant with them.

13 Q Okay. Lieutenant Avery's there at that
14 point. Who else is there at that point?

15 A Lieutenant Avery, T. Williams.

16 Q Is that T-E-E Williams, correct?

17 A T dot E Williams; I guess E is supposed to
18 be a middle initial maybe.

19 Q Okay.

20 A And Taylor, Officer Taylor is there, and the
21 deputy, I guess last name is Paul, Rivera
22 Paul, I believe.

23 Q And the others are correctional officers,
24 and then there was a sheriff's deputy?

25 A Yes.

1 Q And the sheriff's deputy, you encountered
2 him first, right?

3 A Yes.

4 Q And then the other officers you just named
5 came sometime after you encountered Deputy
6 Rivera.

7 A Yes.

8 Q Is it possible that Rivera's his last name
9 and not his first name? Just if you know.

10 A I believe it's his last -- I believe it's
11 his last name.

12 Q Okay. So let's refer to him as Deputy
13 Rivera, okay?

14 A Yeah, that's his last name.

15 Q All right. How long did this encounter last
16 between you and Rivera first?

17 A Couple minutes maybe.

18 Q And then once Lieutenant Avery comes -- she
19 was a lieutenant at that point?

20 A Yes.

21 Q Once Lieutenant Avery and the others that
22 you named came, how long did that encounter
23 last before you went into the visiting room?

24 A Also maybe a couple minutes. The whole
25 situation was -- the whole situation was

1 within a couple minutes.

2 Q How long were you then in the visiting room
3 before someone came back to talk to you?

4 A Approximately an hour; 45 minutes to an
5 hour.

6 Q And at that point you're wondering what's
7 going on?

8 A I mean, I figured they was doing a cell
9 search.

10 Q Did you have any indication why they were
11 doing a cell search?

12 A Yeah, because the officer on the unit said
13 that he smelled smoke and somebody was
14 smoking on the unit.

15 Q And were you thinking at that point that
16 they were thinking you were the one who was
17 smoking?

18 A At that point I didn't know why they
19 particularly picked me to search my cell,
20 because I had nothing to do with -- I had
21 absolutely nothing to do with the smoking
22 incident.

23 Q Did they say anything to indicate why they
24 thought to single you out?

25 A The report indicated that I was up by the

1 area by the visiting room, but there were
2 several people up by the area. They didn't
3 name -- it doesn't name all the people that
4 were in the area, but they said that there
5 was several people by the area, and upon
6 officer's inspection, that he noticed
7 sockets had -- was tampered with and noticed
8 other debris that someone was smoking.

9 Q So the socket being tampered with, that's to
10 try to get something lit; --

11 A Yeah.

12 Q -- is that why they do that?

13 A Yeah.

14 Q Had you ever done that?

15 A No.

16 Q Since you were up there, and I guess this --
17 actually, you know, I'll say this: What
18 happens before you encounter the officers
19 and you get decentralized and -- none of
20 that's really all that important to this
21 case.

22 A Right.

23 Q And I was going to ask you about what you
24 saw, but frankly, at this point I'm not even
25 concerned about that. So anyway, they come

1 back to you eventually after searching your
2 cell, correct?

3 A Yes.

4 Q And who talks to you first?

5 A Lieutenant Avery.

6 Q Is she in charge there?

7 A She was the -- I'm -- she was the lieutenant
8 that was assigned to that floor.

9 Q So of the officers that are there after they
10 come back, was she in charge, as far as you
11 know, --

12 A As far as --

13 Q -- on scene?

14 A As far as I know.

15 Q You recognized her as being the highest
16 ranking person there.

17 A Captain Hannah had -- while I was in the
18 visiting booth, Captain Hannah, he did come,
19 he walked into the unit, he was on the unit
20 for a brief moment, maybe 10 minutes at best
21 maybe. He came back off the unit. He was
22 accompanied with Sergeant Rightberry
23 (phonetic spelling). He came back off the
24 unit and he walked out of my view, and I'm
25 assuming that he left -- at that point that

1 he left -- I mean, I know now that he didn't
2 end up leaving the floor, but at that time I
3 was assuming that he left the floor, so...

4 Q You didn't see him after the time you just
5 described to me, at least on the day of this
6 incident?

7 A I seen him after -- after the whole
8 incident, --

9 Q Sure.

10 A -- he arrived -- you know, with him being a
11 captain, he arrived in response to the whole
12 situation afterwards at some point, but
13 before the actual incident happened, no,
14 that was the only time I seen him.

15 Q Okay. And did you talk to him when you saw
16 him before the incident?

17 A I attempted to.

18 Q So how'd you attempt to talk to him?

19 A As he walked past, I call his name, Captain
20 Hannah, can I talk to you, and, you know, he
21 kept walking.

22 Q So he never said anything to you?

23 A Not that -- not before -- not beforehand.

24 Q And these questions I'm going to ask you are
25 about beforehand. What did you say to him

1 other than asking if you could talk to him?

2 A Nothing. You know, he was walking past.

3 I'm, Captain Hannah, Captain Hannah, can I
4 talk to you, you know, what's going on, and
5 he kept walking.

6 Q Had you had any contact with Captain Hannah
7 before that day?

8 A Sure. I mean, I've been -- was in the
9 County for quite some time, so I mean I've
10 spoke to him -- I've spoken to him on
11 numerous occasions. They'd be coming
12 through the office -- coming through the
13 units or --

14 Q Captains do periodic inspections through the
15 units, right?

16 A Yeah.

17 Q So you probably, in all likelihood, saw him
18 inspecting a unit before the day of this
19 incident?

20 A Yeah.

21 Q Had you talked to him before the date of the
22 incident?

23 A Yes. I talked to him on several occasions.

24 Q Would he know who you are, do you think? On
25 that day, do you think he knew who you were?

1 A Yes.

2 Q Had there been any disciplinary incidents
3 that you might have been involved in that
4 you dealt with Captain Hannah on?

5 A Yes.

6 Q How many times you think that was?

7 A Maybe five maybe, throughout the time of
8 being there.

9 Q Any of those involve failure to follow
10 orders, that you remember?

11 A Yeah.

12 Q How many of those five do you think involved
13 failure to follow orders?

14 A I mean, that's a -- that's a common -- if
15 you receive a write-up, that's gonna be one
16 of them most common violations that they're
17 gonna give you is failure to follow an
18 order.

19 Q Okay. Before the date of this incident, how
20 many disciplinary violations had you had
21 that you've been written up on?

22 A Possibly five. Four or five maybe.

23 Q And how many of those four or five that --
24 at least some of the violations sustained
25 where you had either time served or

1 disciplined for?

2 A Maybe three or four of them.

3 Q Had you ever been tased before, during this
4 incarceration at the jail?

5 A No.

6 Q How about before that, had you been
7 incarcerated before that when you suffered a
8 taser -- tasing incident?

9 A No.

10 Q So this incident was your first time getting
11 tased?

12 A Yes.

13 Q Inside or outside at any facility?

14 A Yes.

15 Q You been tased since?

16 A No.

17 Q Once was enough?

18 A Yeah, that don't -- that hurts.

19 Q I've heard. I've heard. You're not the
20 first person to say that. How about
21 Lieutenant Avery, had you had any
22 interactions with her before this day?

23 A Same thing with Captain Hannah, they worked
24 the jail, I've been there for -- been there
25 for quite some time, a year plus at that

1 time, almost a year-and-a-half. So I had
2 multiple occasions with her. I wouldn't say
3 that any of those occasions were bad
4 occasions.

5 Q How about any of the other officers? And
6 let's include Captain Hannah, had you had
7 any negative interactions with them such
8 that you'd have bad feelings towards them or
9 they'd have bad feelings towards you? Do
10 you understand what I'm getting at?

11 A I don't necessarily know about them having
12 bad feelings towards me. They're
13 professionals. They're supposed to maintain
14 a professional demeanor at all times when
15 they employed there. I don't have any
16 personal -- or didn't have any personal
17 negative feelings towards any of those
18 officers involved.

19 Q You didn't feel before that day that any of
20 those officers had caused you difficulties
21 unnecessarily?

22 A Not before that -- not before that date, no.

23 Q And I know you can't read their minds, but
24 were you involved in any incidents with any
25 of those officers before this date that

1 might lead them to have negative feelings
2 about you? And let's exclude Captain Hannah
3 because he's not a defendant. Let's just
4 stick with the three defendants here.

5 A There were prior incidents of me being in
6 the -- in the jail, of incidents where I'm
7 sure that they were aware of. I don't know
8 what type of feelings that may have created
9 within them towards me, but I'm sure there
10 were -- there were situations.

11 Q I appreciate that answer. Were any of the
12 situations that they might be aware of, did
13 any of those situations involve the direct
14 participation of any of the defendants in
15 this case? In other words, if there was a
16 disciplinary incident, was Lieutenant Avery
17 involved in it in any way, did she
18 participate in disciplining you, did she
19 respond to a scene? And the same thing with
20 respect to the rest of them.

21 A Her being a lieutenant, she has responded to
22 -- she has responded to things. She -- I
23 mean, yes, she's responded, but I don't
24 recall necessarily her writing me a ticket
25 or initiating any disciplinary procedures or

1 issuing before that ticket, that I recall.

2 Q And how about the others? We're talking
3 about Williams, and who's the third?

4 A Officer Dortsch was the third, and Taylor,
5 or Williams and Dortsch.

6 Q The defendants in this case are Avery,
7 Taylor, and Williams, correct?

8 A Yes.

9 Q But Dortsch was also there, correct?

10 A Yes, he --

11 Q He's just not a defendant.

12 A Yeah, he was there. He's just not a
13 defendant in this case. I know Officer
14 Williams wasn't working there that long at
15 the time of the incident. Taylor and Avery
16 would have both been here the whole time I
17 was there. So how the County works is if
18 there's an incident or situation regarding
19 whether I caused the situation or another
20 occupant at the County caused the situation,
21 they -- if they hit their emergency button,
22 all available officers will respond. So in
23 that -- in that sense, there's been numerous
24 interactions when they come on the unit,
25 everybody locked in, things like that, but

1 I've never had any altercations with them
2 that I would think that would cause any type
3 of, you know, significant ill wills or
4 things of that nature.

5 Q Thanks for the response. I appreciate that.
6 And as far as any of your four or five
7 previous disciplinary incidents, as far as
8 you recall, none of the defendants in this
9 case, Taylor, Williams, or Avery, were
10 directly involved in your other disciplinary
11 incidents.

12 A I mean, not in a -- not in a significant
13 role.

14 Q Okay. And you can't count out that they
15 might have been aware of other incidents
16 that you may have been involved in with.
17 You just don't know that, right?

18 A I mean, that County is not a -- that County
19 is not a big place, so -- I mean, if
20 something happened, I'm sure the officers
21 make each other aware and know of a
22 situation. So I can't say specifically
23 that, you know, one person told another, you
24 know, be aware of this -- be aware of this
25 particular situation with Knight or things

1 like that, but I'm sure that they all --
2 they talk and things like that.

3 Q Well, okay. So based on what you might have
4 heard from the officers, other occupants, do
5 you know what, if any, reputation you had
6 among the officers there at the County prior
7 to this incident? Like you say, everybody
8 talks, right?

9 A I'm not sure. I've heard that they had me
10 under several investigations at different
11 times.

12 Q For what? Do you know? And when you say
13 they, you're not talking about defendants
14 specifically, you're talking about jail
15 administration in general.

16 A Yeah, in general, but I couldn't say
17 necessarily who it was that had me under the
18 investigation. I've heard different times
19 for fraternization, heard different times
20 for just things going on on the units, if --
21 I mean, other than that, I wouldn't -- I
22 wouldn't know what else they would be
23 looking at me for.

24 Q Based on your lack of significant -- well,
25 let me ask you this. I never did ask you.

1 Did you ever have to do time in 4D before
2 this incident?

3 A Yes.

4 Q How much time?

5 A The most time I did on 4D, maybe two months
6 in summer of 2022.

7 Q Do you know what the charge you were found
8 -- I don't know what the right -- correct
9 term is, it's not found guilty of. I guess
10 maybe they do say that. You'd think I'd
11 know that. I see these forms all the time.
12 Do you know what the charge was that caused
13 you to have to do 60 days?

14 A So I was placed on administrative
15 segregation. I didn't get found guilty of
16 any rule violations. I was -- I was on the
17 unit. I requested a medical emergency. The
18 officer said that I refused to lock in, so I
19 was taken to the hold for that. In the
20 process of going to the hold, there was some
21 resistant -- there was resistance from the
22 unit to the hold. I was wrote up for
23 resisting, staff assault, violating the
24 rules and policies.

25 Q You said you almost always get that one,

1 right, or --

2 A Yeah, that's --

3 Q -- failure to follow orders?

4 A Yeah, that's common in any write-up. So
5 there was several rule violations, but all
6 of those rule violations I was found -- all
7 those rule violations got dismissed. But I
8 was -- but I was still placed on ad seg as a
9 result of those -- of those violations,
10 although they was dismissed, and I
11 ultimately ended up staying in 4D for, like
12 I said, possibly two months.

13 Q Okay. Was that the only incident that you
14 were involved -- or that you were accused of
15 getting into a physical confrontation with
16 an officer, or officers? Is that the only
17 time?

18 A Yeah, that I -- yeah.

19 Q How about with other inmates prior to this
20 incident? Were you involved in any physical
21 altercation with other inmates?

22 A Yeah.

23 Q How many times?

24 A Twice, but I was found not guilty for one of
25 them.

1 Q And the one that you were found guilty of,
2 how much time did you end up doing in the
3 hold?

4 A Twenty -- 22 days.

5 Q And I shouldn't refer to it as the hold, but
6 technically 4D typically is segregation,
7 correct?

8 A Yeah, but I wasn't on 4D when that happened.
9 I was -- I was on another unit when it
10 happened, due to 4D unit being full.

11 Q Okay. Have we covered the physical
12 altercations you were involved in with
13 either staff or occupants before this
14 incident?

15 A That I can recall.

16 Q How much did you weigh at the time of this
17 incident?

18 A Approximately 275, 280 maybe.

19 Q How tall were you at the time of the
20 incident?

21 A Six four.

22 Q Same dimensions now, about?

23 A Yes.

24 Q Were you working out while you were in the
25 jail or...

1 A Not really.

2 Q Not much opportunity there, right?

3 A No.

4 Q Push-ups in your cell maybe?

5 A No.

6 Q You look like you're just naturally strong,
7 a big guy?

8 A Yeah, this is my natural size.

9 Q Had you ever been subjected to OC spray in
10 the jail before the day of this incident?

11 A No.

12 Q How about since?

13 A No.

14 Q Never experienced OC spray in your life?

15 A I have, and I don't like it.

16 Q When were you sprayed? When were you
17 subjected to it?

18 A I was in -- during the time -- during the
19 years of 2015 through the end of 2019 I was
20 in Cook County Jail in Cook County, Chicago,
21 Illinois.

22 Q And you already told me this was the only
23 time you'd ever been tasered, correct?

24 A Yeah.

25 Q Okay. We took a bit of a detour there.

1 Let's go back to this incident. So they
2 come back to you after you're in -- locked
3 in the visiting booth, and all three of the
4 defendants come back to you; is that
5 correct?

6 A Yes.

7 Q And who speaks with you first?

8 A Lieutenant Avery.

9 Q And what'd she say to you?

10 A She initially asked me -- she informed me
11 that they found contraband in the room, that
12 I would be going to seg.

13 Q Did she say what the contraband was?

14 A I think she said she found cigarettes,
15 tobacco, and some paper.

16 Q Cigarettes, tobacco, and paper?

17 A She said she found four cigarettes, and then
18 loose tobacco wrapped in paper.

19 Q Did you respond to that?

20 A Yeah. I asked her, you know, why you all --
21 why was I being targeted? I had nothing to
22 do with -- I had nothing to do with the
23 situation of anybody smoking. I wasn't even
24 in the area. She told me that they seen me
25 on camera in that area, and I explained to

1 her that I had a scheduled visit that day,
2 so I did go upstairs and look at the
3 visiting booth. My name wasn't on the
4 screen. I came down. I went back up there
5 a second time and looked again, it wasn't on
6 the screen. At this time it was approaching
7 a little bit after 5:15, maybe 5:20. Visits
8 end at 5:30, so I figured, you know, I'd
9 just visit tomorrow. I use a visit
10 tomorrow. She kept asking me where did I
11 get the cigarettes from, and I told her it
12 wasn't mine.

13 Q Were you in a single cell or did you have a
14 cellmate?

15 A I was in a single cell.

16 Q So you denied that they were yours. Was
17 there further conversation about what they
18 were doing in your cell if they weren't
19 yours?

20 A Well, she stated, well, we found them in
21 your cell. She kept asking me where did I
22 get them from, did a staff member give these
23 to me, how did I get these in the
24 institution, things of that nature, and I
25 just --

1 Q Did you continue to deny that you knew
2 anything about them?

3 A I told them y'all wasn't -- they not mine.

4 Q Okay. So then what was said, if anything?

5 A She told me that I'd be going to seg. And
6 she walked away for a minute. She walked
7 away for a minute. I did hear her call
8 classification unit saying that I'd be
9 transferred to 4A for disciplinary ad seg.

10 Q Okay. Is the door to the visiting room open
11 or are you talking to her through --

12 A I'm talking through the door.

13 Q And you could also hear her on the phone
14 through the door?

15 A Yeah.

16 Q Okay. Go ahead.

17 A And eventually she come back and I asked
18 her, why am I being placed on ad seg. And
19 she explained that, oh, this is serious
20 contraband and things like that. And I did
21 have a conversation with her saying that --
22 we're talking about cigarettes, we're not
23 talking -- it's not like I -- this is a
24 knife or something serious. Why am -- I
25 understand being placed on disciplinary.

1 Why am I being also placed on ad seg after
2 disciplinary.

3 Q I'm going to stop you there for just a
4 second. Sorry to interrupt you. Are you
5 saying ad seg?

6 A Yeah. Administrative segregation, ad seg.

7 Q Just wanted to clarify that. I don't know
8 if she was aware. I know what ad seg is but
9 I wasn't sure, so... Sorry. Please
10 continue.

11 A She eventually asked me -- she said that I
12 would be placed on ad seg and -- you know,
13 she asked me was I gonna comply. And I told
14 her I wanna speak to Captain Hannah.

15 Q Why'd you want to speak to Captain Hannah?

16 A Because I didn't understand the reason why I
17 was being placed on ad seg right out the
18 gate. I had to be -- I haven't been found
19 guilty of any rule violations, I haven't --
20 I haven't even been heard on the ticket, so
21 why am I being placed right on ad seg right
22 out the gate? And I explained to her that
23 -- you know, I consistently adamantly
24 explained to her that I wanna -- I wanna
25 speak to Captain Hannah about this ad seg

1 that I shouldn't be placed right on ad seg.

2 Q Okay. You disagreed with that, and as a
3 result, you wanted to speak with Captain
4 Hannah.

5 A Yeah.

6 Q How many times did you have to -- did you
7 tell her that you wanted to speak with
8 Captain Hannah?

9 A I can't necessarily put a number on it. It
10 was a lot, you know, because I was adamant,
11 I was very adamant about the fact that I
12 wanna talk to Captain Hannah.

13 Q And you were adamant about the fact that you
14 didn't think you should be placed on ad seg;
15 would that be accurate?

16 A Yeah, just the ad seg. I understood that --
17 I tell her like I understand -- you know,
18 I'm not contesting the -- being placed on
19 disciplinary status. I mean, the situation
20 is what it is. Y'all say y'all went in my
21 cell, y'all say you found cigarettes, I
22 understand disciplinary status. I don't --
23 there's no way around it.

24 Q This wasn't your first go-around.

25 A No.

1 Q Been there for a while, you had other
2 discipline, correct?

3 A Yes. I said I understand the disciplinary
4 process of this, but why am I being placed
5 right on ad seg.

6 Q Okay. So explain to me the difference
7 between just being placed on discipline and
8 being placed immediately on ad seg.

9 A So when they take you -- if they take you to
10 seg and they put you on disciplinary/ad seg,
11 that means that whatever rule violations
12 that you've got they're gonna come -- give
13 you the ticket, they're gonna give you X
14 amount of days for the rule violation, and
15 you serve that time, whatever time they give
16 you for the violations, you serve that time.
17 And after that time is served, instead of
18 getting out of segregation and going back to
19 a regular general population unit, you
20 remain in segregation on ad seg pending your
21 review, and they do reviews weekly to
22 determine whether they're gonna allow you
23 out of segregation or continue to hold you
24 on segregation.

25 Q So the issue in your mind was on the back

1 end you -- after you did your time, you were
2 still going to have to stay in segregation
3 for up to a week at least.

4 A Yeah.

5 Q And I'm curious, what did it turn out?
6 After your review, did you get out of ad seg
7 right away, or not?

8 A Not right away. So fast-forward past the
9 incident, when I was in seg, they eventually
10 came and -- they eventually came and did the
11 ticket. She initially -- Deputy Sawchek
12 (phonetic spelling), I'm not sure how to
13 spell her name, but she initially gave me 25
14 days segregation time on top of the fact
15 that I would be on ad seg. I appealed -- I
16 put in an appeal regarding the ticket. The
17 ticket was -- the time expired for them to
18 do the ticket. They have 72 hours to do the
19 ticket. The time frame expired on the
20 ticket. The ticket was supposed to get
21 dismissed. I put in the appeal for it.
22 Eventually the ticket got overturned --
23 after 22 or 23 days on the ticket, the
24 ticket actually ended up getting overturned,
25 but I still remained on ad seg for another

1 month maybe, month-and-a-half maybe.

2 Q Well, and the administrative segregation,
3 that's a whole different process than the
4 disciplinary process, correct?

5 A In a sense, yeah.

6 Q Because you don't have to be disciplined to
7 get put on administrative segregation,
8 correct?

9 A My experiences with administrative
10 segregation, you have had to have done
11 something to be placed on administrative
12 segregation, which would have initially been
13 the disciplinary reason. The way Milwaukee
14 County does their ad seg, I've seen people
15 come straight off the streets, just because
16 of the type of case that they have, and be
17 placed right on ad seg, so... When I was
18 placed on ad seg, I requested their policy
19 regarding ad seg and I -- they never gave
20 that to me.

21 Q My understanding is that if -- well, first
22 off, prisoners coming into the jail are
23 classified, they go through a classification
24 process to see what security level they
25 should be placed on. Are you familiar with

1 that?

2 A Yeah.

3 Q And then some occupants go right to
4 administrative segregation if they have very
5 serious charges, homicide, for instance, or
6 if they're alleged to have been involved in
7 a physical altercation with an officer, for
8 instance. Does that sound about right to
9 you?

10 A As far as Milwaukee County, yeah.

11 Q Right. And so your physical altercation
12 with the officers for this incident, at
13 least based on their version of the events,
14 that more than likely was going to lead to
15 some period of administrative segregation
16 for you, based on what you understand about
17 how Milwaukee works, right? Or not? I
18 mean, if you don't have an understanding,
19 that's fine.

20 A So what my understanding is, a lieutenant
21 can recommend that you be placed on
22 administrative segregation. If they decide
23 to, you're placed on administrative
24 segregation automatically until Captain
25 Cunningham, who's the third shift

1 classification officer, reviews it and
2 decides to take you off. So it's kind of
3 one of those situations where you can do
4 something and the lieutenant decides that I
5 wanna place you on ad seg. Or, as you say,
6 you can come right in with specific charges
7 and be placed on ad seg, so --

8 Q And then there are regular reviews of the
9 classification status. Captain Ducert,
10 D-U-C-E-R-T, does those kind of --

11 A Yeah, I know he was the supervisor over
12 classification, I believe. Yeah, so there's
13 multiple -- like I said, there was multiple
14 reasons why they can place you on it. It's
15 not necessarily a guarantee.

16 Q So had you been on administrative
17 segregation before this incident?

18 A Yes.

19 Q And what incident caused you to be placed on
20 administrative segregation? Have we talked
21 about it already, is that the--

22 A Yes.

23 Q -- inmate to inmate incident?

24 A No, it was -- like I said, I got in in the
25 summer of 2022. Like I said, I called the

1 medical emergency. The officer decided that
2 -- he said it was a refusal. There was some
3 resisting involved and they stated that
4 Inspector Dobson got injured. So as a
5 result of that, I was placed in seg and then
6 I was placed on administrative segregation.
7 However, the ticket was dismissed. And
8 after two months, I finally was able to, you
9 know, speak with Captain -- Inspector
10 Dobson, and Inspector Dobson in turn
11 informed them that I did not injure him and
12 that I did not assault him or any officer
13 and instructed Captain Cunningham to take me
14 off ad seg.

15 Q So do you know how Inspector Dobson ended up
16 involved in that incident that you just
17 described and that you described to me
18 earlier?

19 A During that time, there was very shortness
20 of staff at the jail, so I guess they
21 needed, you know, every available -- every
22 available officer that they could, you know,
23 have that was -- responded to things or that
24 was working at the time. A lot of officers
25 were working overtime. So it wasn't

1 uncommon to -- it wasn't uncommon to see
2 some of these Inspector Dobsons or multiple
3 captains respond to a particular situation
4 at any given time.

5 Q So he was one of the officers that responded
6 to your refusal to -- or whatever incident
7 started this whole thing that we were just
8 talking about?

9 A Yeah.

10 Q All right. Let's get back to the incident
11 itself. So you're asking for Hannah and
12 they don't get Hannah for you?

13 A No.

14 Q And how long are you asking for Hannah? How
15 much time's passed since they re-approached
16 you after your cell was searched?

17 A So she walked away, she made her phone call,
18 Lieutenant Avery. Within minutes -- within
19 minutes they came back to the door, just
20 when it was Lieutenant Avery, Deputy Rivera,
21 Taylor, Williams. Taylor -- no. Deputy
22 Rivera opened the door.

23 Q Hang on a second.

24 (Exhibit No. 1 marked.)

25 Q I'm going to hand you what's been marked as

1 Exhibit Number 1. Can you identify what's
2 shown in that exhibit?

3 A Yeah, this is Lieutenant Avery standing in
4 front of the door, Deputy Rivera is behind
5 her, T. Williams is in front of her, and
6 Taylor is holding the -- Taylor is holding
7 the restraint belt, RIPP restraint belt.

8 Q Okay. Based on what you just said, I've put
9 names above the heads of the four officers
10 shown standing outside the door, correct?

11 A Yeah.

12 Q And did I label them correctly, based on
13 your testimony?

14 A Yes.

15 Q So Rivera is the farthest left in Exhibit 1,
16 Avery's the next person, going left to
17 right. Williams is standing back slightly,
18 but he's the next person, and then the
19 farthest person to the right is Taylor; is
20 that correct?

21 A Yes.

22 Q And are they standing outside a door of a
23 visiting booth?

24 A Yes.

25 Q Do you know if that's the door you were in

1 on the day of this incident?

2 A Yes.

3 Q We've sent you the video of the incident,
4 correct?

5 A Yes.

6 Q Have you had an opportunity to see those
7 videos?

8 A Briefly, yes.

9 Q There were videos from the floor cameras and
10 there was some body cam video, correct?

11 A Yes.

12 Q How long ago was it that you saw the video?

13 A Couple weeks ago maybe. It's been difficult
14 getting this place here to comply with
15 allowing me to see the video footage.

16 Q Based on your recollection, and you had a
17 chance to review the video, did it
18 accurately show what happened on the day of
19 the incident?

20 A Yeah.

21 Q You didn't recognize there being any gaps in
22 the video, for instance, right?

23 A I mean, I'm not an expert at that, but I --
24 not that -- not that I can tell.

25 Q Okay. So do you --

1 A The video -- those video footage is so --
2 they only allowed me to view the video
3 footages twice since you've -- since you've
4 sent them and I received it January 31st.
5 So I've been able the review it twice, each
6 time for one 45-minute session, and, you
7 know, the footage of these videos are longer
8 than 45 minutes when you view them in their
9 entire. So my review of the -- my review of
10 the footage mainly consisted of kind of
11 cropping it to -- not necessarily cropping
12 it, but like limiting my viewing to the
13 incident.

14 Q I understand that. This appears to say that
15 this video was from 2023, 05/31, so that's
16 the day of the incident. And it looks like
17 it says 18:11.45. So that's 6:11 military
18 time. Does that sound about right in terms
19 of what time this happened?

20 A Yeah, because it was after -- it was after
21 dinner time. So that's -- that would
22 roughly be a good estimate.

23 Q Does the fact that Officer Williams is
24 holding a RIPP belt indicate to you that
25 this is the -- that this is the second time

1 that they came back after --

2 A Officer Taylor is holding the RIPP belt.

3 Q Oh, sorry. Officer Taylor. Does that
4 indicate to you that this is the second time
5 they approached your door after the cell
6 search was done? You were telling me that
7 when Avery came back, they had this -- you
8 had the consideration about cigarettes and
9 you had asked for Hannah. Does this
10 screenshot, does this look like it's from
11 the second time that they came to your cell
12 door?

13 A I know this screenshot was at the point
14 where they came to actually attempt to
15 remove me out of the room. Avery did come
16 to this door a couple times, I'm not sure
17 exactly how many times it was, but I believe
18 that this would have been the first time
19 that all four of them came to the door at
20 the same time to remove me from the visiting
21 booth.

22 Q Okay. Any of the other times -- well, was
23 Taylor there before they were going to
24 remove you?

25 A Yeah, Taylor was part of the -- Taylor was

1 part of the -- when they first brought me
2 off the unit, Taylor was one of the officers
3 that was with Lieutenant Avery when they
4 stated they was gonna do a cell search.

5 Q So they told you that they were going to
6 search your cell when they took you off the
7 unit? I thought they told you you were
8 going to have an attorney?

9 A No. Once -- as I was explaining, when they
10 brought me off the unit, Rivera attempted to
11 put me in this room, this visiting booth
12 room. When I looked into the visiting booth
13 room and I didn't see my attorney, I told
14 them I don't want to visit, I want to go
15 back. He kept telling me, just go in the
16 room, go in the room. I'm, no, my attorney
17 not here. I don't want the attorney visit.
18 If my attorney is here, when he come up
19 here, tell him I'll call him tomorrow and he
20 can inform me when he's coming and I'll talk
21 to him then.

22 Q Did Rivera eventually give you an order to
23 go into the visiting booth?

24 A I don't recall if he necessarily gave me an
25 order. He -- I know he was saying like just

1 go in the booth. I'm like --

2 Q They don't say, this is an order, I'm
3 telling you to go into the booth. When they
4 tell you to do something, --

5 A Yeah, he kept --

6 Q -- that's an order, right?

7 A He just said, Knight, you know, you go in
8 the booth. And I'm like, no, if this was an
9 attorney visit, I don't want the attorney
10 visit, I wanna go back to the cell. At this
11 point I didn't see Avery, Williams, or
12 Taylor. They were over here by the officer
13 station. And she eventually came around the
14 corner, and I did see Williams and Taylor
15 with her, and she -- that's when she was
16 state to me, no, okay, well, it's not an
17 attorney visit, we here to search -- we here
18 to search your cell. I need you to go into
19 a visiting booth.

20 Q They fessed up what the real purpose of you
21 going in the visiting booth was.

22 A Yeah.

23 Q All right. So they come back, they tell you
24 what they found, Avery tells you that you're
25 going to not only go for disciplinary

1 reasons but administrative segregation. You
2 then ask for Hannah and she doesn't get you
3 Hannah.

4 A No.

5 Q What happens then? You're still in the
6 visiting booth at this time with the door
7 shut?

8 A Yeah.

9 Q Okay. What happens next?

10 A So eventually like at this point, like this
11 exhibit is showing, they come to the door
12 and she's telling me that I'm gonna be going
13 to seg. I believe she asked me was I gonna
14 comply with them.

15 Q Meaning coming out of the cell?

16 A Yeah.

17 Q Voluntarily.

18 A Yeah.

19 Q Were you saying things -- did you tell her,
20 hey, I'm not coming out until I see Hannah
21 or talk to Hannah?

22 A Not at that point. At that point I was just
23 quiet. I wasn't responding to them at all.

24 Q Okay. And so did she order you to come out?

25 A I don't recall if she specifically ordered

1 me to come out of the booth. I know at some
2 point that she did step back. Rivera came
3 to the door and said we're gonna open the
4 door. When I open the door, I want you to
5 put your hands out.

6 Q How did you respond to that, if at all?

7 A I didn't.

8 Q Just quiet?

9 A Yeah, I was leaned up against the wall and I
10 was unresponsive.

11 Q Did Rivera say that more than once, that he
12 was going to open the door and you should
13 put your hands forward?

14 A I don't recall if he said it more than once.
15 I know that he stated that he was gonna open
16 the door and for me to put my hands out. At
17 which point I know he did open the door
18 slightly, and Taylor, Taylor was standing
19 there saying, Knight, cuff up. And he asked
20 me a couple times but I was -- I just -- I
21 just -- I was unresponsive to him.

22 Q Okay.

23 A At that point, I believe that's the point
24 when Lieutenant Avery made a radio call
25 asking for additional staff, and that's when

1 Officer Dortsch, he responded.

2 Q Okay. Was he the only additional officer
3 that responded at that point?

4 A At that point, that I could -- that I could
5 tell, that I was able to see at that point,
6 yeah.

7 Q Okay. So what happens next?

8 A So when I wasn't -- I wasn't responsive, I
9 remember T. Williams stepping back and
10 pulling out his taser and pointing the taser
11 at me saying that if I didn't -- if I did
12 anything other than cuff up that he would
13 tase me.

14 Q Okay. Did you take that as another order to
15 cuff up?

16 A I really was -- I really was -- I really was
17 unresponsive to him. I heard him say it. I
18 know he telling me if I did anything other
19 than cuff up.

20 Q Why not just comply?

21 A I didn't like the ad seg thing and I was
22 requesting that -- I was requesting -- I
23 felt like I was being railroaded, because I
24 actually didn't have anything to do with the
25 whole smoking -- because I wasn't the only

1 person whose cell got searched. There was
2 other individuals whose cell got searched,
3 but I had nothing to do with being upstairs
4 in that booth smoking or doing none of that.
5 So it was like, why am I being targeted when
6 you come do the cells -- y'all come to the
7 -- respond to this unit to the situation of
8 somebody smoking, why am I being targeted
9 when I had nothing to do with that situation
10 at all.

11 Q So you were upset at the situation.

12 A In a sense, yeah.

13 Q Felt like you'd been wrongly accused?

14 A For smoking, yeah, because I wasn't -- I
15 wasn't smoking anything.

16 Q At that time.

17 A No, I wasn't smoking at all.

18 Q Well --

19 A I mean, they searched the cell and they
20 found stuff in the cell, but before that
21 happened, I had nothing to do with the
22 situation leading up to them responding to
23 the unit for somebody smoking.

24 Q But you said earlier a comment I appreciated
25 that they found cigarettes in your cell and

1 you were going to go to discipline
2 regardless, right?

3 A Yeah, I was -- yeah.

4 Q You recognized that at the time.

5 A Yeah.

6 Q And you said it was really that ad seg part
7 that made you uncooperative or unhappy about
8 the whole situation, right?

9 A Yeah, I was -- I wanted to -- I wanted to
10 rectify the ad seg aspect of the situation.

11 Q And you thought maybe the captain could do
12 that for you.

13 A I mean, he's above the lieutenant.

14 Q Did it make you unhappy that she wouldn't
15 get Captain Hannah for you?

16 A I would say it was frustrating a little.

17 Q Frustrating enough that you stopped
18 answering them and didn't come out of the
19 cell when they told you to, right?

20 A Yeah, I mean, I became unresponsive, yeah.
21 So at that point, when the door was opening,
22 Deputy Rivera, he's holding the door open,
23 Williams, he pointed a taser at me, and
24 Taylor is kind of in front of me. He cuffed
25 my -- he handcuffed my left hand and -- he

1 handcuffed my left hand and then he pulled
2 me kind of out of the booth or kind of
3 walking out of the booth. Dortsch is right
4 there. Dortsch gets my right hand. And at
5 this time, their backs are kind of towards
6 the wall --

7 Q Hang on a second. You were just giving me a
8 narrative about what occurred after they
9 opened the door and were ordering you to get
10 out. I'm going to have the court reporter
11 mark this. I think this photo appears to be
12 about that time.

13 (Exhibit No. 2 marked.)

14 Q I'll show you what's been marked as Exhibit
15 Number 2. Does this screenshot reflect the
16 narrative you were just telling me?

17 A Yes.

18 Q Okay. So you said their backs were --
19 they're facing the door, correct?

20 A At this point in this screenshot, they're
21 facing the door. Taylor has my hand. I
22 recall at least one of my hands cuffed. I
23 recall at least my left hand cuffed, and as
24 I was coming out of the booth, they kind of
25 came in a, kind of in an arch. So as he's

1 backing -- as he's backing out, they kind of
2 came into the arch to the point almost where
3 they were kind of facing the wall, their
4 backs was kind of towards the wall, and my
5 back was more so pointing towards Lieutenant
6 Avery in a sense almost.

7 Q Okay. So you kind of turned to your right
8 as you were being escorted out of the cell,
9 or out of the --

10 A No. My left.

11 Q To your left. Okay. So Exhibit 2 shows
12 Officer Taylor with a blue glove on his left
13 hand and has a hand on your arm, your right
14 arm, correct?

15 A Yes.

16 Q And I think you had, at this point in
17 Exhibit 2, one handcuff on maybe your left
18 wrist?

19 A At least -- at least my left hand was
20 cuffed, and I know he would have been trying
21 to cuff my right hand.

22 Q Okay. And these cuffs are the cuffs on the
23 RIPP belt?

24 A Yeah.

25 Q When you say trying to cuff your other hand,

1 why wasn't he able to just cuff your other
2 hand?

3 A I mean, he was -- he was -- he was bringing
4 me out the booth. At the time, you can't
5 see it, it shows on the video that my
6 attention was directed towards Williams.

7 Q Because he still has a taser drawn?

8 A Yeah.

9 Q And does he have a taser drawn on Exhibit 2
10 in this photograph, --

11 A Yeah.

12 Q -- that you can see? Okay. It looks like
13 you're engaging with him, talking to him?

14 A Yeah, I was.

15 Q What were you saying to him?

16 A Something to the -- something to the nature
17 of him not supposed -- him not being able --
18 him not supposed to tase me with no
19 handcuffs on and that that's a lawsuit.

20 Q Did you use that word, lawsuit?

21 A Yeah.

22 Q How did he respond?

23 A I don't -- he maintained his demeanor.

24 Q Did he say anything?

25 A Not that I recall.

1 Q All right. So what happens after
2 everybody's in the position shown in Exhibit
3 Number 2?

4 A Like I said, I was pulled out. At that
5 point, Officer Taylor and Officer Dortsch
6 were standing in front of me. Both of my
7 hands were handcuffed, both of my hands were
8 secure.

9 Q Let me stop you there. Which one's Officer
10 Dortsch?

11 A This guy. (Witness indicating.)

12 Q Your handwriting's better than mine. I
13 should let you handle this. I've now
14 labeled above Officer Dortsch's head Dortsch
15 on Exhibit 2?

16 A Yeah.

17 Q Okay. So eventually somebody gets a second
18 handcuff on you, correct?

19 A Yeah, Dortsch -- they had both my -- they
20 got both my hands cuffed and they're holding
21 both my hands.

22 Q So they're standing -- you're face-to-face
23 with them?

24 A Yeah.

25 Q Where is Williams?

1 A At that point he was still somewhere behind
2 me to --

3 Q Could you see him?

4 A So...

5 Q Or was your attention on the officers in
6 front of you?

7 A So he would have been like over my -- behind
8 me, over my left shoulder to a degree.

9 Q Okay. Do you know if he still has a taser
10 drawn?

11 A I know at some point that he -- that him and
12 Lieutenant Avery both holstered their
13 tasers.

14 Q Okay. So Williams wasn't the only one who
15 has a taser out as they're pulling you out,
16 Avery also did?

17 A Yes.

18 Q Just those two, though?

19 A That I know of.

20 Q Okay. So you've got your hands cuffed in
21 front of you, but the RIPP belt's not
22 tightened yet at that point, right?

23 A No.

24 Q Two officers, one -- or they're each holding
25 one of your hands or your arm or what?

1 A Collectively both holding my hands. Like
2 holding my hands and wrists, it was like
3 both -- both of their hands were engaged on
4 holding --

5 Q Two hands on one of yours each?

6 A Yeah.

7 Q So you're face-to-face with them. Are you
8 -- and you're obviously within arm's length
9 of them.

10 A Yeah.

11 Q Are your arms outstretched at that point, or
12 are they tight to your waist?

13 A They're extended to a degree.

14 Q Okay.

15 A Yeah, they would have been extended to a
16 degree.

17 Q Are the officers against the wall where the
18 door for the visiting room is at that point?

19 A Yeah, their backs -- as far as I remember,
20 yeah, their backs are more so towards the
21 wall.

22 (Exhibit No. 3 marked.)

23 Q I'll show you Exhibit 3. Does that look
24 like a photo next -- relatively close in the
25 sequence?

1 A Yes.

2 Q And that shows Officer Dortsch and what
3 other officer with their backs somewhat
4 against the wall?

5 A Taylor.

6 Q So Taylor and Dortsch. And then do they
7 have your hands in that Exhibit Number 3?

8 A Yeah.

9 Q And are both your hands handcuffed, to your
10 recollection, at that point?

11 A Yes.

12 Q Looks like Officer Williams still has his
13 taser out?

14 A Yeah. I mean, you can't see it from this
15 view, but on the video footage, from a
16 different angle, Avery also has her taser
17 out too.

18 Q Avery's to Williams' right in Exhibit 3,
19 right?

20 A Yes.

21 Q He's a big guy, right?

22 A Yeah.

23 Q So he's blocking out the view of her,
24 correct?

25 A Yes.

1 Q But it's your recollection that she hadn't
2 holstered her taser yet at the point shown
3 in Exhibit 3; is that right?

4 A Correct.

5 Q And you look to still be engaging Williams;
6 is that right?

7 A Yeah.

8 Q Do you know what you're saying to him at
9 that point?

10 A Would have been something -- I know -- I
11 know I said something to him about regarding
12 him tasing me being cuffed, and that that's
13 a lawsuit.

14 Q Did you say that more than once to him?

15 A I believe so.

16 Q Do you know how many times?

17 A Not necessarily. I mean --

18 Q More than three?

19 A Possibly.

20 Q You just know more than once for sure.

21 A Yeah, I know -- I know I repeated it. I'm
22 not sure -- I'm not sure exactly how many
23 times that I repeated it, but I know I
24 repeated it to him more than once.

25 Q So why did that come to your mind at that

1 point?

2 A Because in my time in Milwaukee County Jail,
3 the officers have a tendency of responding
4 immediately and pulling their tasers out and
5 tasing people to a degree where it was like
6 that was not -- that was not necessary for
7 you to tase this person. And that's how
8 they respond. To any given situation when
9 they come in, you know, first -- when they
10 respond to a situation, first thing they do,
11 they come in yelling and they pull out their
12 tasers and they pointing their tasers at
13 you, and it's like is that really -- that's
14 kind of excessive.

15 Q Did you ever resist Taylor or Dortsch,
16 physically resist them putting your hands in
17 handcuffs?

18 A What you mean by resist?

19 Q Pull your hands away, move your hands,
20 anything to make it difficult for them to
21 cuff you.

22 A I don't know how to answer that, because I
23 wasn't -- I wasn't -- I wasn't necessarily
24 resisting them. I believe they found it
25 more difficult to cuff my hands, but I

1 wouldn't -- I wouldn't say that I was
2 necessarily resisting them.

3 Q Would you characterize it as passively
4 resisting them? You know what I mean by
5 that?

6 A No, explain.

7 Q You might not have been moving your hands,
8 swinging your hands so they couldn't get it,
9 but maybe stiffened up, tensed up, wouldn't
10 allow them to grab your wrist to move it.
11 That would be more passive resistance than
12 actively swinging your hand around just so
13 they couldn't get the handcuffs on.

14 A I mean, with a taser pointed at me, I did
15 tense up. I got fears of being shot, and
16 that's -- a taser going off sound like a
17 gun, it look like a gun, sound like a gun.
18 So I mean, I'm sure I tensed -- I'm sure I
19 would have tensed up with this taser being
20 pointed at me.

21 Q Would you agree with me that had you simply
22 cooperated, that there wouldn't have been a
23 risk of you getting tased? In hindsight?

24 A I mean, it's very much possible.

25 Q All right. So let's move on then. After

1 the scene is set in Exhibit 3, what happens
2 next?

3 A As I described in my complaint, they
4 holstered their tasers. T. Williams -- the
5 Officer Williams approached me from behind
6 and he reached around -- he reached around
7 my body to grab -- to grab -- to grab the
8 restraint belt.

9 Q Okay. And if you stop there for a second.

10 (Exhibit No. 4 marked.)

11 Q I'm going to show you Exhibit Number 4.

12 That's a screen capture, correct?

13 A Yes.

14 Q And you were just describing that the next
15 thing that occurred was Officer Williams had
16 reached around from behind you to try to
17 grab the RIPP belt.

18 A Yeah.

19 Q Is that what's shown in Exhibit 4?

20 A Yes.

21 Q Kind of looks like he's giving you a bear
22 hug there?

23 A Yeah.

24 Q From behind, correct?

25 A Yeah.

1 Q And it looks like Dortsch and Taylor are
2 still --

3 A They're still -- at that point -- I mean, I
4 know that -- I see that the camera -- their
5 body's blocking the view of what's going on,
6 but at that point they both still have a
7 secure grip on both of my hands and they're
8 both holding onto me with both of their
9 hands.

10 Q Is anybody saying anything to you at this
11 point in Exhibit 4, shown in Exhibit 4?

12 A That, I'm not quite certain. Dortsch may
13 have been talking to me saying like just --
14 I mean, come on, let's just get it over
15 with, something to that -- something to that
16 degree. I had a good rapport with
17 Dortsch. You know, he would come on the
18 unit, we would talk, things like that. So
19 I'm sure at that point that he was -- might
20 have been saying something to nature like
21 just come on, man, let's just -- we've been
22 through this before, come on, let's just go
23 down here.

24 Q So it was your belief that he was trying to
25 deescalate the situation?

1 A Yes.

2 Q And were the other officers talking in that
3 same way trying to deescalate the situation?

4 A I do know that -- I do know that Dortsch
5 was.

6 Q Okay. So as Williams is trying to -- well,
7 let me ask you this: Is it your
8 understanding that at that point shown in
9 Exhibit 4, Williams is trying to attach the
10 Velcro RIPP belt around your waist?

11 A I mean, common sense would say that that's
12 what he's trying to do at this point,
13 looking at the -- looking at the -- looking
14 at the footage.

15 Q When he grabbed you from behind, was it your
16 understanding that the next thing that was
17 going to happen was he was going to try to
18 put the RIPP belt around your waist? I
19 mean, he's not just giving you a hug there.
20 He's doing that for some purpose. Right?

21 A Yeah, I mean, there was no -- there was no
22 type of verbal indication prior to this
23 that, you know, I'm gonna wrap this around
24 your waist or that they was gonna attempt to
25 put it around -- put that belt around my

1 waist. I know in a situation like this at
2 some point the belt does -- they put the
3 belt around your waist, but at this point
4 where he -- where he approached me and
5 reached around -- and reached around me, I
6 wasn't -- I wasn't resisting him or
7 anything. As he reached around me --

8 Q But that's the next logical thing to happen
9 there, right, is that once they get your
10 hands secured, they're going to put the belt
11 around your waist before they transport you
12 anywhere?

13 A Yeah.

14 Q Okay. And is it fair to say that that's --
15 at this point shown in Exhibit 4, you
16 believe that's what was happening? Or you
17 just didn't know.

18 A It just -- it all transpired kind of fast.

19 Q Do you know how long this thing from when
20 they approached you to take you out, how
21 long -- how much time passed between that
22 point and what we see in Exhibit 4 here? I
23 mean, is it a matter of seconds, minutes?

24 A Would have been probably -- probably would
25 have been a few -- from the time they came

1 to the door and to this point now?

2 Q Right.

3 A Two to three minutes maybe.

4 Q Yeah, maybe we can figure it out from here.

5 This one says 18:11, and -- that's Exhibit 1

6 I was just referring to, and Exhibit 4 says

7 18:14?

8 A Oh, wow.

9 Q Do you see that?

10 A That was faster than I thought then.

11 Q So we've gone three minutes in time, if the
12 time is accurate on these, from when they
13 approach you to get you out until your hands
14 are cuffed and they're trying to put the
15 RIPP belt on. Is that accurate, based on
16 what you see here, the time stamps on these
17 photos?

18 A Yeah.

19 Q And you seem surprised that it was only
20 three minutes. I'm sure it felt like longer
21 probably, right?

22 A Yeah.

23 Q Okay. So he's reaching around, we think, to
24 try to attach the RIPP belt. There wasn't
25 any other reason he would have been reaching

1 around that you can identify, right?

2 A No.

3 Q What happens next after everybody's in the
4 position shown in 4?

5 A He reaches around me to pull the belt. Once
6 he get -- once he get the belt and kind of
7 pull the belt towards to wrap it around my
8 waist, the officer in front of me pulled my
9 hands back and --

10 Q Back out away from you?

11 A Yes. Because they're holding -- they're
12 holding my hands in front of me to try to --
13 you know, to keep my hands secure. Both my
14 hands cuffed, they're trying to keep my
15 hands secure, they're holding my wrists and
16 arms with the handcuffs. So after he wraps
17 around and grab the belt and pull the belt
18 back, it's pulling my hands as well, because
19 my hands' attached to the handcuffs. The
20 officer in front of me pulled my hands back
21 towards them.

22 Q Okay. Is anything being said at that point
23 in time? As he's pulling on the RIPP belt
24 and the officers in front of you are pulling
25 your hands away from you, is anything at all

1 said, or does this happen really fast and
2 nobody says anything?

3 A That part happened really fast, and I don't
4 recall -- I don't recall -- are you
5 referring to what they communicated with
6 each other?

7 Q Yeah. Or said to you.

8 A No.

9 Q So there's no talk between them or from you,
10 there's just nobody saying anything at that
11 point.

12 A Not as -- not in relation to, okay, we're --
13 I'll finish secure the belt around him or
14 any of that nature, or not he's gonna put
15 the belt around you, or anything of that
16 nature, no.

17 Q Okay. And as Williams starts pulling the
18 belt from behind, you said the officers in
19 front of you who have your hands, they
20 eventually pull your hands in the other
21 direction.

22 A Yes.

23 Q And there's no conversation going on at that
24 point.

25 A Not that -- not that I recall.

1 Q Okay. What happens next?

2 A At -- Williams immediately let go of the
3 belt and reaches around my head area, then
4 whatever they call the technique that they
5 use, he reached around my head, wrapping his
6 -- one of his arms around the lower part of
7 my -- lower part of my face and his upper
8 arm around the forehead and upper part of my
9 face, and he stepped back and he flings me
10 down to the ground.

11 Q Okay.

12 A My hands get snatched away from Officer
13 Taylor and Officer Dortsch, who immediately,
14 as I'm -- as I'm going down to the ground,
15 immediately -- they all immediately respond.

16 Q Okay. Does Williams say anything to anybody
17 before he takes you down, or is it almost
18 instantaneous?

19 A Instantaneous, like --

20 Q So your hands get pulled forward by the
21 other officers, and he immediately takes you
22 down.

23 A Yeah.

24 Q And nothing's said.

25 A Not that I recall.

1 Q Do you know where he was looking when he was
2 trying to pull the belt to fasten it around
3 your waist?

4 A I mean, based on this, it looked like he
5 looking forward, or at least forward down
6 towards my hands. I mean, he was over -- he
7 was behind me, so I couldn't necessarily say
8 exactly where he was looking, but based on
9 the photo in front of me, he appears he's
10 looking over my shoulder.

11 Q He reacted by taking you down like he
12 thought you were trying to resist having the
13 belt put around your waist, correct?

14 A Yeah.

15 Q And you can't say one way or the other
16 whether he knew the officers were the ones
17 pulling your hands away from you, correct?

18 A The way I see it is there was an extreme
19 failure to communicate with the officers,
20 because at the point that -- at the point
21 that both of my hands were secure, you've
22 seen the video, I've seen the video, I
23 wasn't resisting, I wasn't being combative,
24 I wasn't threatening the officers. Officer
25 Williams and Lieutenant Avery both holstered

1 their tasers, which would indicate that this
2 situation is under control, there's no --
3 there was no need for the tasers to be drawn
4 at that point.

5 Officer Williams approached me from
6 behind and grabbed the belt and attempted to
7 pull the belt. There was no additional --
8 there was no prior communication with Taylor
9 or Dortsch that, you know, I'm gonna secure
10 the belt. I don't recall any orders -- I
11 don't recall hearing any orders from
12 Lieutenant Avery saying secure the belt or
13 anything of that nature, that I recall. He
14 immediately comes behind and pulls the belt.
15 I mean, he reached around, grabbed the belt,
16 and he grabbed the belt towards him. The
17 officers in front of me pulled my hands.
18 They almost jerked my hands back towards
19 them as if I'm pulling away from them, but
20 I'm not pulling away from them, my arms are
21 being pulled by this RIPP belt, and Williams
22 immediately responded.

23 Q So back to my original question. He didn't
24 say anything to you before he took you down,
25 the other officers didn't say anything to

1 indicate that he was aware that it was not
2 you that pulled --

3 A Not that --

4 Q -- your hands forward.

5 A Not that I know of. Not that I recall them
6 saying anything to each other.

7 Q And whether you pushed your hands forward on
8 your own or they pulled your hands forward,
9 that isn't really gonna be apparent to him
10 as he's standing behind you, right? I mean,
11 they've got ahold of your hands. So if they
12 pushed them forward or if you pulled them
13 forward, it's gonna look the same to him,
14 right?

15 A He'd feel a level of -- he would feel a
16 level of resistance either way.

17 Q It's going to look the same to him. If
18 they're holding onto your hands and they
19 pull you forward as opposed to you pushing
20 them forward, that's gonna look the same to
21 his eye, right?

22 A That's fair to say.

23 Q Appreciate that. So the decentralization,
24 that move that he put on you to take you to
25 the floor, were you injured by that process

1 at all?

2 A I felt pains throughout the whole --
3 afterwards throughout the whole situation.
4 I can't say necessarily what was attributed
5 to what as far as -- I mean, I was tased, I
6 was punched in the stomach, I have seven
7 different officers on top of me.

8 Q Okay. But I'm asking you specifically about
9 the decentralization, that move that he put
10 on you to take you to the floor. Did you
11 feel anything upon that move?

12 A Yeah, for being thrown to the ground, yeah,
13 having them forcefully grab me, throwing me
14 to the ground from my neck area.

15 Q You remember instantly feeling pain upon
16 that move?

17 A I would say I felt pain -- afterwards I know
18 that I felt pain in my neck area, back area,
19 legs, like my body hurt.

20 Q But you can't -- I'm assuming you can't
21 differentiate between whether that move, the
22 decentralization by Williams, caused the
23 pain you later felt or whether it was
24 officers being on top of you, or being
25 tased. You don't have any way of dividing

1 that up as to when those things -- when the
2 pain you felt after, what caused it, I guess
3 is the best way for me to say it.

4 A I mean, I'm not a medical expert, but
5 however, he was the one that had my head
6 area, so... I mean, a common inference
7 would be if he's at my head area and I feel
8 pain in my head and neck area, that he's the
9 person that caused it.

10 Q Okay. Fair enough. So when you -- is he
11 successful in getting you -- taking you down
12 to the ground?

13 A Yeah, he get me down.

14 Q What happened after he took you to the
15 ground?

16 A It had an adverse reaction to that.

17 Q Explain, please.

18 A At that point I felt as if I was being
19 attacked by the officers. I did twist. I
20 did twist, and at one point -- at one point
21 kind of stood back up.

22 Q Tried to get back up?

23 A Yeah, and tried to get back up to my feet.
24 At that point, there were several officers
25 that was -- that -- like I said, they

1 responded immediately, there was several
2 different officers at that point. Somebody
3 did get me -- somebody did grab my legs and
4 they got me down, at which point I stopped
5 resisting. I wasn't -- I mean, I had
6 several officers --

7 Q Let's take a quick break for a second.

8 (Brief recess taken.)

9 Q I want to break it down a little bit here.
10 So Williams takes you down. He gets you all
11 the way to the ground or are you on your
12 knees?

13 A I wanna say that he initially got me down,
14 and I made it back up to my knees maybe.

15 Q And is he the only officer in physical
16 contact with you at that point, that you're
17 able to get back up to your knees, or have
18 others joined in?

19 A I know immediately as he began to --
20 immediately as he took me down, I do know
21 that, based on the video, Officer Taylor
22 like immediately tried to follow up with
23 securing -- with keeping my hands --

24 Q Because he did have your hands.

25 A Yeah, they did have my hands so...

1 Q I'm sorry, I talked over you there. Go
2 ahead.

3 A But he immediately followed through with
4 trying to maintain his hold on my hands. My
5 hands did get snatched away from him, so
6 they immediately -- I mean, everything
7 happened immediately. When he pulled, they
8 immediately responded.

9 Q You said, my hands got snatched away from
10 him. Is that as a result of Williams taking
11 you down or is that as a result of something
12 you did to get your hands away from Taylor?

13 A No, I'm being -- at this point I'm being
14 thrown. He's doing the -- they call it
15 decentralization, I say he threw me down.

16 Q It's a fancy word for that, I'll agree with
17 you.

18 A Yeah. At that pint my hands are -- due to
19 force used, my hands are snatched away from
20 Dortsch and Taylor, but they immediate --
21 they're immediately following through with
22 trying to grab -- keep my hands secure as --
23 as I'm going down to the ground.

24 Q You've got a RIPP belt attached to your
25 hands, but your hands are out in front of

1 you, and you'd have the ability to swing
2 your hands if you so desired, right, at that
3 point?

4 A Theoretically.

5 Q So they're going to make efforts to try to
6 re-secure your hands and get that belt
7 around your waist, right?

8 A Yes.

9 Q And in fact, as you're wrestling around on
10 the ground, they try to put that RIPP belt
11 around you, right?

12 A That's debatable.

13 Q All right. Well, let's keep breaking it
14 down. So Williams is the only officer when
15 you try to get back up on your feet. Do you
16 get any farther than your knees or are you
17 just on your hands and knees?

18 A I may have made it up to my actual feet.

19 Q Are they yelling at you, any of the
20 officers?

21 A Yeah. They -- what was being -- at the time
22 of the -- at that point -- everything
23 happened so fast. I know that they would
24 have been saying stop resisting just from --

25 Q Experience and that's what they do?

1 A Right, that's how -- that would have been
2 the protocol for them to do that, so I know
3 that they would have been saying something
4 along the nature of stop resisting. But the
5 situation is happening so fast that --

6 Q Your getting up to your knees after they
7 took you to the floor, would it be your
8 belief that the officers would have
9 perceived that as you resisting?

10 A It's fair to say. My actions were -- as I
11 said, I felt -- at that point, when it
12 exceeded to that point, in my mind it's
13 y'all attacking me. So it was an adverse --
14 it was a natural reaction, adverse reaction
15 for -- when this happened, like hold on,
16 what y'all doing. This ain't -- this not
17 how this supposed to -- this is not how this
18 is supposed to go. But at the point where --

19 Q I'm sure you're not thinking at that point,
20 boy, if I get up to my feet they're gonna
21 think I'm resisting, you're just
22 instinctively doing it.

23 A Yeah, it was -- it was -- it was -- right,
24 it -- instinctively it was just like, hold
25 on, what's going on. I mean, I'm not

1 accustomed to somebody just -- if somebody
2 attacked me, to just stop and lay down and
3 not -- like instinctively it was just like
4 what's -- hold on, this ain't right, this
5 ain't how this supposed to be going.

6 Q So your instinct is to, if somebody's
7 physically, in your view, attacking you,
8 would be to fight back; is that accurate?

9 A Depends on the circumstance.

10 Q Okay. Under this circumstance?

11 A Under this circumstance, I wouldn't wanna
12 catch a new case by assaulting one of the
13 officers, so it wouldn't be my intentions to
14 fight with them, especially considering the
15 fact of the amount of time that I was facing
16 in my criminal cases.

17 Q Some would say that given all that time, you
18 could argue that what could they do to you
19 for this.

20 A Nah, I ain't -- I'm not of that belief
21 system, because it can always get worse.

22 Q All right. So at some point are you then
23 taken back down to the ground after you're
24 on your knees?

25 A Yeah.

1 Q Is that when the other officers joined in,
2 or was Williams able to get you to the
3 ground himself?

4 A Other officers joined in. Other officers
5 joined in, and at that point I was -- I was
6 fully on the ground. At the time, I didn't
7 know how many officers it was, but looking
8 at the camera footage, there were seven
9 different officers from my head down to my
10 ankle/feet area that were -- that were
11 pretty much on top of me. I felt somebody
12 like grab my face, almost as if they were
13 trying to stick their fingers in my eyes. I
14 felt somebody punch me in the stomach.

15 Q You've now found out that that was
16 Lieutenant Avery, right?

17 A Yes. Upon getting the discovery material
18 and reading the reports, I found out that
19 she was the one that -- I'm assuming she did
20 say that she tried to use a pressure point
21 area in the -- behind the ear or face area,
22 so I'm assuming that that was maybe her hand
23 that was on my face area, but I'm not sure.
24 I can't -- I can't necessarily attribute
25 that to any particular person.

1 Q When you're getting these focus strikes,
2 they call them, in the stomach area, are you
3 flat on your stomach at that point, so like
4 they're more on your side, or are you still
5 partially up off of your stomach?

6 A No, on the -- I'm on the ground.

7 Q Okay. And you don't see who gives you these
8 strikes, but as I said, in the discovery
9 materials, the reports reflect that it was
10 Knight, correct?

11 A Yeah, at the time, I didn't feel --

12 Q Or Avery. I'm sorry. Not Knight.

13 A Yeah, at the time, I didn't know who did it.
14 I felt it. I didn't know who did it at the
15 time.

16 Q Because somebody's at your head at that
17 point, right?

18 A Yeah. Somebody's all over my whole body.

19 Q Okay. Where is Williams? Is he on top of
20 you, under you, next to you?

21 A All the officers are on top of me.

22 Q Including Williams.

23 A Yeah.

24 Q Where are your hands?

25 A In front of me.

1 Q Where? At your waist, up by your face, at
2 your chest? Where are they?

3 A I would assume chest area.

4 Q Well, when you say you assume that, that
5 tells me that maybe you don't remember where
6 they were. Do you remember?

7 A I don't necessarily recall where they were.
8 I know that I didn't grab the officer.

9 Q You know where I was headed with that
10 question, don't you?

11 A Yeah.

12 Q So it's your testimony that you never
13 grabbed any of the officers?

14 A No.

15 Q Not at any point during this whole thing.

16 A I never -- I never grabbed officer
17 T. Williams by a shirt collar, by his neck,
18 I never grabbed him at no point. I never
19 grabbed/struck any of the other officers.

20 Q Do you recall being ordered to let go at any
21 point?

22 A As I said, all of that happened -- all of
23 that happened fast. It was a lot of yelling
24 going on. I don't necessarily recall being
25 told to let go of the officers. I know I

1 didn't -- I know I didn't have a hold of the
2 officers.

3 Q That's a little different question. Do you
4 recall being told to let go?

5 A No.

6 Q Even if you didn't have a hold of an
7 officer?

8 A I don't -- I don't recall being told to let
9 go.

10 Q Might you have been told to let go and you
11 just didn't hear it, or you definitely did
12 not ever -- none of the officers told you to
13 let go? Which is it?

14 A That's a difficult -- that's a difficult
15 question to answer. If I was told to let
16 go, that would be -- almost me being saying
17 that I had ahold of the officer. I never --
18 I never grabbed the officer. Did he say let
19 me go? I'm really not -- I'm really not
20 certain.

21 Q So you don't remember.

22 A I don't recall whether he said let him go or
23 not.

24 Q Okay. So after -- we now know it's --
25 Lieutenant Avery gives you these strikes.

1 What happens after that?

2 A Like I said, it all happened so fast. I
3 know I ended up -- they took me to the
4 ground. Eventually get -- once they get me
5 down, I wasn't resisting anymore, the
6 officers are on top of me. I hear, taser,
7 taser, and immediately everybody moves and
8 he's shooting me with the taser.

9 Q Everybody?

10 A Yeah, I feel -- I didn't feel nobody -- I
11 didn't feel nobody on top of me anymore, and
12 he shot me with the taser.

13 Q Do you know who?

14 A Taylor.

15 Q Did you see it, or you know it from the
16 discovery materials and the video?

17 A So after he shot me with the taser, I did
18 his -- however long it -- however long the
19 taser was, when I looked back, he was
20 standing -- he was standing over me holding
21 the taser pointing down.

22 Q And the wires are still attached?

23 A Yes.

24 Q So that was a pretty good indicator that
25 he's the one who shot you.

1 A Yes.

2 Q Do you know how long the taser was activated
3 once he shot you?

4 A It seemed like forever. I'm not sure
5 exactly in seconds of how long it was but...

6 Q Was it one discharge, as far as you knew?

7 A As far as I know.

8 Q You didn't feel a second jolt.

9 A No.

10 Q And it's your recollection that none of the
11 other officers were in contact with you when
12 the taser struck you.

13 A As far as I remember, none were. And upon
14 watching the video footage of the situation,
15 I know that when he yelled taser, the
16 officers immediately started moving to the
17 point where Officer Dortsch even pulled
18 Officer -- I mean, Lieutenant Avery away
19 from me so that they was clear of -- clear
20 of me when he shot his taser.

21 Q What happened after they were done tasing
22 you?

23 A I was laying on the ground. I looked back
24 at him and I asked him, why did you tase me?

25 Q So he was behind you, Officer Taylor was?

1 A Yeah.

2 Q So you were --

3 A Or I'm facing this way and he would have
4 been maybe over the left side of me behind
5 me, in a sense.

6 Q Okay. So the court reporter can't really
7 pick that up, so let me see if I can
8 describe what you just said. So you're
9 laying on your -- mostly on your stomach,
10 and Taylor was towards your feet on your
11 left side.

12 A Yeah.

13 Q Was he all the way back by your feet or
14 somewhere between your head and your feet?

15 A He would have been more -- if I can recall
16 correctly, more so towards my feet.

17 Q Where's Williams when you are done being
18 tased?

19 A I wasn't sure. They was all standing there.
20 I'm not exactly sure what position he was --
21 he was standing in. I know at some point he
22 did end up by my head area.

23 Q And you know that because you saw him or he
24 was talking to you or both?

25 A I made a comment and he responded to it.

1 Q What'd you say?

2 A I asked him, why did y'all tase me? And
3 Taylor initially responded, gee, you was
4 tripping. And I'm like -- and I said that,
5 man, I wasn't tripping shit. Excuse my
6 language. That man dude just grabbed me by
7 my head and threw me down to the ground and
8 y'all just tased me. Y'all tripping. And
9 Officer Williams responded that he -- that I
10 was taken down because I was resisting and
11 pulling away from officers, something to --
12 he responded something to that nature, that
13 you were taken down because you were
14 resisting and pulling away from the
15 officers. And I told him I wasn't pulling
16 away from -- I wasn't pulling away from
17 y'all. Y'all are tripping. You just
18 grabbed my head. I believe I told him like
19 you jumped the gun and just grabbed my head
20 and threw me down and I wasn't just
21 resisting. At that point they was telling
22 me roll over, and somebody put the --
23 actually secured -- at that point secured
24 the RIPP belt. I'm not sure who it was.

25 Q Up until that point, the RIPP belt hadn't

1 been secured around your waist, correct?

2 A Correct.

3 Q And then what happened?

4 A At that point somebody secured -- wrapped
5 the RIPP belt around. I was still laying
6 down for -- I still was laying down on the
7 ground for a minute, maybe, they called the
8 medical, requested medical to come. At this
9 point a lot of other additional officers
10 responded. Who they all were, I'm not sure.
11 It was just the officers that responded to
12 it, additional staff. The nurse arrived and
13 she came and she removed the metal prongs
14 from my -- the taser shot me in my upper --
15 I mean, lower left back and my upper left
16 buttock. So she removed -- she removed both
17 of the prongs. She asked me -- she asked me
18 was I -- something to was I good.

19 Q Like meaning you -- you took it to mean do
20 you have any other physical complaints
21 that --

22 A Yeah.

23 Q -- she needed to treat?

24 A Yeah, and I -- and she said something, do
25 you want me to clean it, are you good?

1 Q Did you take that to mean clean the wound
2 where the taser hit you?

3 A I asked her, clean what? And she said,
4 clean the wounds, clean the entry wounds.
5 And she asked me, are you good? And I
6 responded, hell, no. I don't know if they
7 say that I refused medical treatment. She
8 asked me was I good, and I was telling her,
9 no, I'm not.

10 Q What was the problem there, other than the
11 fact that you had been shot with the taser?
12 What were you feeling? Or was that a
13 general comment about what all just
14 happened?

15 A That was a -- both. Like --

16 Q So explain the physical parts for me then,
17 please.

18 A I just got thrown down to the ground.

19 Q No, I mean, I'm talking injury-wise.

20 A Pains in my stomach, I just got punched in
21 my stomach, the taser in my back caused --
22 that caused additional pain. That hurts
23 very bad. That's the --

24 Q For how long?

25 A Like I tell you, it felt -- it felt forever.

1 I don't know exactly how long the tase --

2 Q Are we talking about hours, days, weeks,
3 months?

4 A Oh, how long did the pain --

5 Q Yeah.

6 A -- persist after that?

7 Q (Nodding.)

8 A Several days.

9 Q Can you describe that pain that lasted
10 several days?

11 A There was pain in my -- I was -- my upper
12 left buttock and lower back area very stiff,
13 sore to the touch, difficult to lay on.

14 Q Did it cause you to lose sleep?

15 A I don't sleep that much.

16 Q What physical activities did it affect? Or
17 was it just tender?

18 A It was hard -- it was hard to sit on. I'd
19 say it caused -- it caused pain to the point
20 it's like I couldn't necessarily lay on that
21 side for a while. It would -- it would
22 hurt.

23 Q Are you a side sleeper normally?

24 A Yeah.

25 Q All right. So what about any other physical

1 issues caused by the incident?

2 A Back pains.

3 Q Where?

4 A Lower back area.

5 Q Did you have any back pains before this
6 incident?

7 A I do.

8 Q Worked some physical labor before, right?

9 A Yeah.

10 Q So you would suffer some back pains at times
11 before this incident, right?

12 A Yes.

13 Q How were these pains different, if at all?

14 A I would say that they escalated those pains
15 that were -- that was -- I mean, I do have
16 back pains. My back hurts now.

17 Q Have you ever been treated for back pain
18 before this incident?

19 A Mostly they -- I've explained my back pains
20 to them. Okay. So me being diabetic, while
21 I was in the county jail, they typically
22 would do -- every three months I would be
23 seen and evaluated by a doctor and blood
24 drawn, and they would ask if I have any, you
25 know, additional problems and things like

1 that. I have expressed to them my back pain
2 and things like that. They would issue
3 Tylenol or ibuprofen for the back pain
4 previous.

5 Q That was before the incident.

6 A Yeah, before.

7 Q Okay. Are you insulin dependent?

8 A Yes.

9 Q How long?

10 A I was diagnosed with diabetes in October of
11 '21.

12 Q After this incident, did you receive any
13 medical treatment for any of the injuries
14 that you suffered, other than what the nurse
15 gave you at the scene taking the prongs out?

16 A No, not then. But later that night -- later
17 that night I did call a medical emergency.
18 I was in my cell at -- you know, I called a
19 medical emergency and the nurses responded,
20 and I did explain to them the severe pain I
21 was feeling in my back due to being tased,
22 and headache, and my neck and my back stuff
23 hurting.

24 Q Okay. Other than that medical emergency,
25 did you go to the clinic, did you see

1 anybody for any injuries you attribute to
2 this incident?

3 A No.

4 Q I take it that that also includes here in
5 the facility, you haven't gone to the doctor
6 for any problems that you attribute to this
7 incident, --

8 A No.

9 Q -- correct? Were any of your physical
10 activities affected by the injuries that you
11 suffered in this incident after the
12 incident? Was there anything you couldn't
13 do that you could do before the accident --
14 the incident?

15 A No, I wouldn't say so.

16 Q Have we covered all the damages that this
17 caused you, this incident caused you?

18 A I mean, as far as -- it's caused me to --
19 this incident's caused me to have a real
20 fear of tasers. It caused me to -- I get
21 anxiety just at the sight of a taser, the
22 fact that --

23 Q I mean, nobody wants to get tased, right,
24 whether you've been tased or not? Would you
25 agree with that?

1 A Of course.

2 Q Okay. So if you had a fear of tasers after,
3 you probably had a fear of tasers before,
4 correct?

5 A I wasn't worried about tasers before. I've
6 never been in a situation where I
7 necessarily had -- I've never been in a
8 situation where I was tased before. I've
9 been around people -- I've been around
10 correctional officers and things like that
11 prior to this incarceration that they have
12 had tasers and things like that and they
13 have responded with their tasers. Like I
14 said, in Milwaukee County they typically --
15 when they respond to any type of situation,
16 the tasers are drawn. So it never was a
17 situation where the taser was drawn at me.
18 Well, used on me, I would say.

19 Q How many times did you have tasers drawn on
20 you before that day of this incident?

21 A There was several times where -- like I say,
22 if one person on the unit refused, it
23 doesn't have to be me, it could have been --
24 it could be anybody, and they radio, okay,
25 we have a refusal. When the officers

1 respond, in most cases they already have
2 their tasers out and they're pointing their
3 tasers at everybody, go to your cell, go to
4 your cell, go to your cell, things of that
5 nature. So as I say, they -- tasers have
6 been pointed at me before, but I've never
7 had a fear of being shot with the taser,
8 because, okay, I'm going in my cell, I'm not
9 -- I'm not doing it, you have no reason to
10 shoot me with it, but --

11 Q Let me ask you this then: You haven't had
12 to get any psychological counseling for any
13 mental health issues that you might have
14 suffered as a result of this, correct?

15 A I find it hard to trust -- I find it very
16 difficult to talk to -- talk to the psych --
17 I got trust issues.

18 Q So I take it from your answer that you
19 haven't seen any --

20 A No, I haven't.

21 Q -- sought any psychological treatment for
22 any psychological injuries that you might
23 have suffered, including your fear of tasers.

24 A No.

25 Q You don't lose any sleep over this fear of

1 tasers, do you?

2 A I have nightmares.

3 Q How often do you have nightmares?

4 A I have them quite frequently.

5 Q How often is quite frequently; once a month,
6 once a week, what?

7 A Maybe couple times a month.

8 Q And they involve tasers.

9 A They're not all taser -- they're not all
10 taser involved. Some of them -- some
11 nightmares I have where I'm being shot and
12 killed by the police. Other times I'm in
13 jail and I'm being assaulted by officers.
14 So they're not -- they're not necessarily
15 all taser -- like I'm being shot with a
16 taser, but I have frequently had dreams of
17 being assaulted by officers or shot by
18 police or --

19 Q I imagine that this is a -- by this, I mean
20 the prison, is a place that can induce
21 nightmares just being here, right?

22 A I'm pretty sure there's some horrible stuff
23 here.

24 Q I think I'm just about done.

25 (Brief discussion off the record.)

1 Q None of the officers other than Avery hit
2 you during this incident, right?

3 A Not that I know of. That's the only one
4 that I can say for a fact did.

5 Q None of the officers involved in this
6 incident kicked you at any point in time,
7 that you know of, correct?

8 A It does appear that Taylor is, through the
9 video, kneeling down on me with his knee,
10 but I can't say for certain. I don't recall
11 anybody necessarily kicking me.

12 Q Okay. When the officers tried to restrain
13 you on the floor, was there anything
14 excessive about the way they tried to
15 restrain you on the floor, in your view?
16 Set aside the taser and the Avery strikes.
17 Anything else about them trying to restrain
18 you and get control of you on the floor that
19 you thought was excessive?

20 A Like I say, I felt somebody's hand on my
21 face almost trying to -- felt like they was
22 trying to dig their fingers in my eye.
23 Other than that, for the most part, they had
24 me pinned down. Outside of the -- like I
25 say, outside of the being punched and the

1 taser, and outside of that, they mostly had
2 me pinned down.

3 MR. NIKOLAY: Okay. Thanks. That's
4 all the questions I have.

5 THE WITNESS: Would I be able to
6 receive a copy of this transcript for the
7 deposition?

8 MR. NIKOLAY: You'll have to order it
9 from her. She's going to charge you for it
10 so...

11 (Brief discussion off the record.)

12 MR. NIKOLAY: One more note for the
13 record here. Mr. Knight has provided me the
14 nine notes -- nine pages of notes that were
15 discussed earlier. I'm going to take them
16 and copy them and return them by mail to
17 Mr. Knight. Mr. Knight also is going to --
18 is aware that he can request from the court
19 reporter a copy of the transcript, and upon
20 receipt of payment, the transcript will be
21 provided to him. Is that right, Mr. Knight?

22 THE WITNESS: Yes, sir.

23 MR. NIKOLAY: Thank you.

24 (Deposition concluded at 3:17 p.m.)
25

STATE OF WISCONSIN)
) ss.
COUNTY OF BROWN)

I, Jennifer M. McLeod, Court Reporter
and Notary Public in and for the State of
Wisconsin, do hereby certify that the
attached and foregoing deposition was taken
before me at Green Bay Correctional
Institution, Green Bay, Brown County,
Wisconsin, on the 16th day of April, 2024,
A.D., at 1:12 p.m.; that it was taken at the
request of the adverse parties, upon oral
interrogatories; that said KEENAN T. KNIGHT
was sworn by me to tell the truth, the whole
truth, and nothing but the truth relative to
said cause.

Dated this 24th day of April, 2024.



A handwritten signature in black ink that reads "Jennifer M. McLeod".

Jennifer M. McLeod

My commission expires May 23, 2027.

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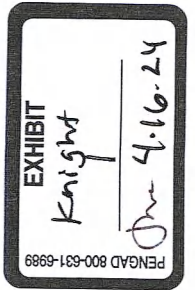
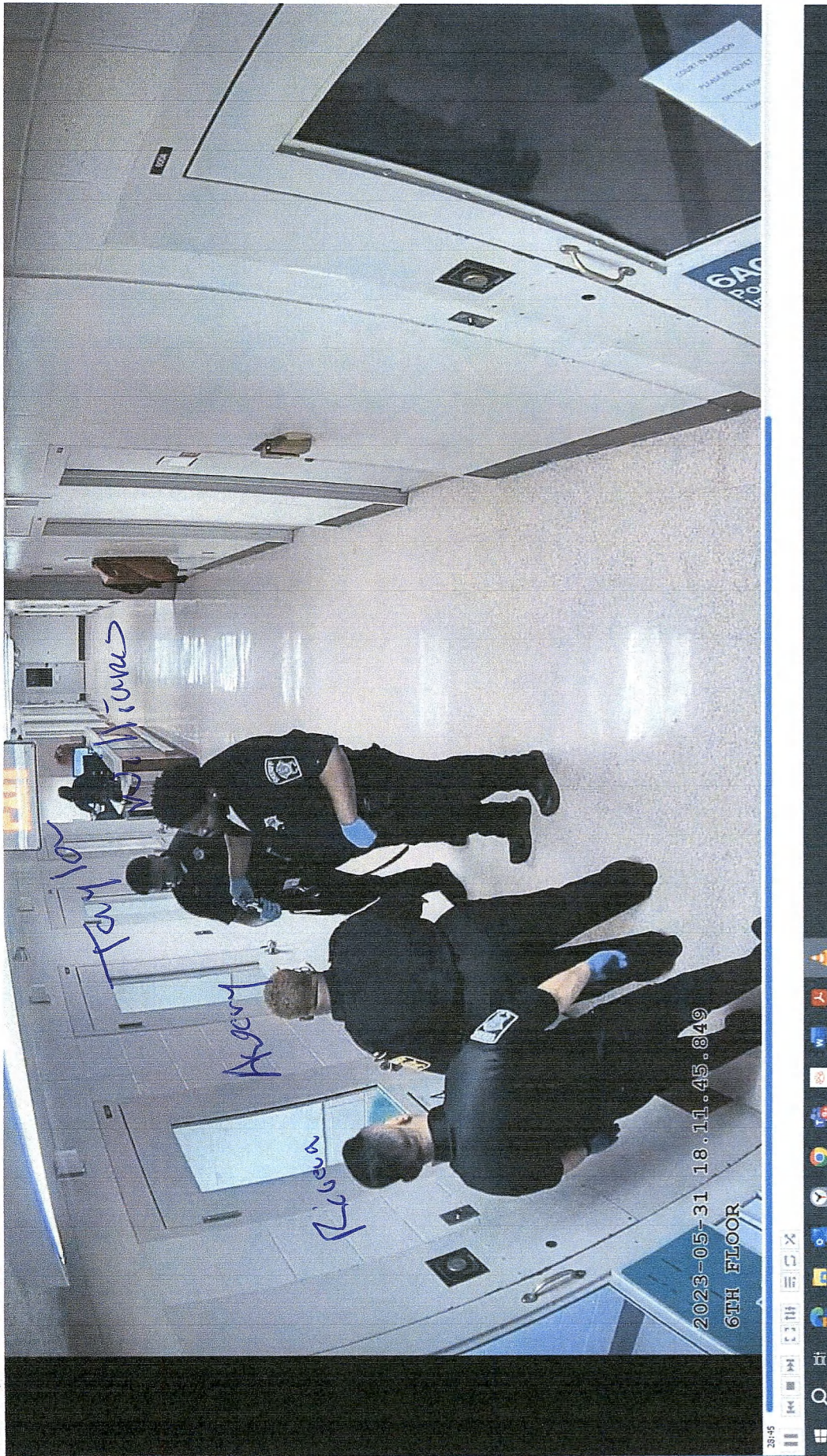
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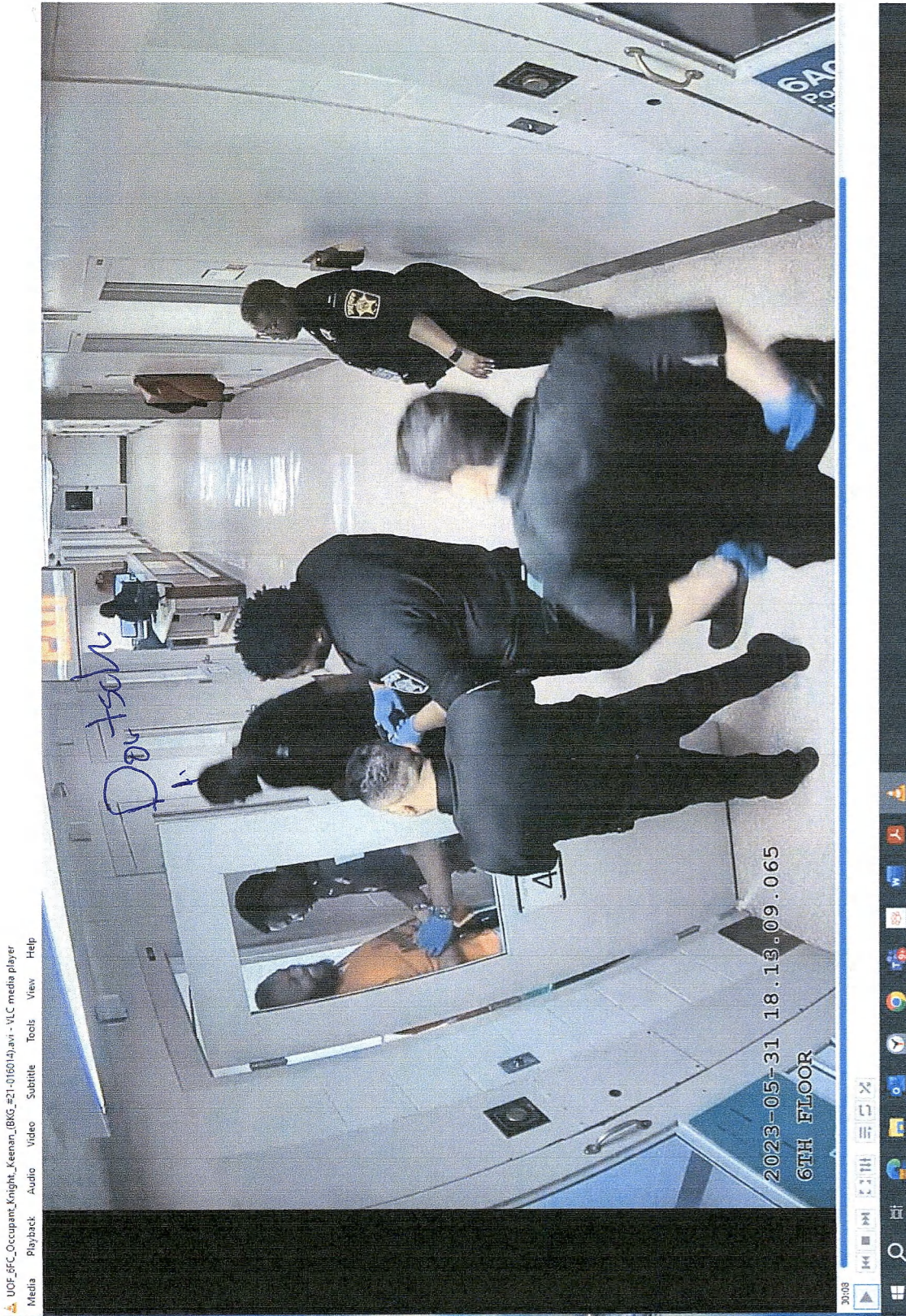


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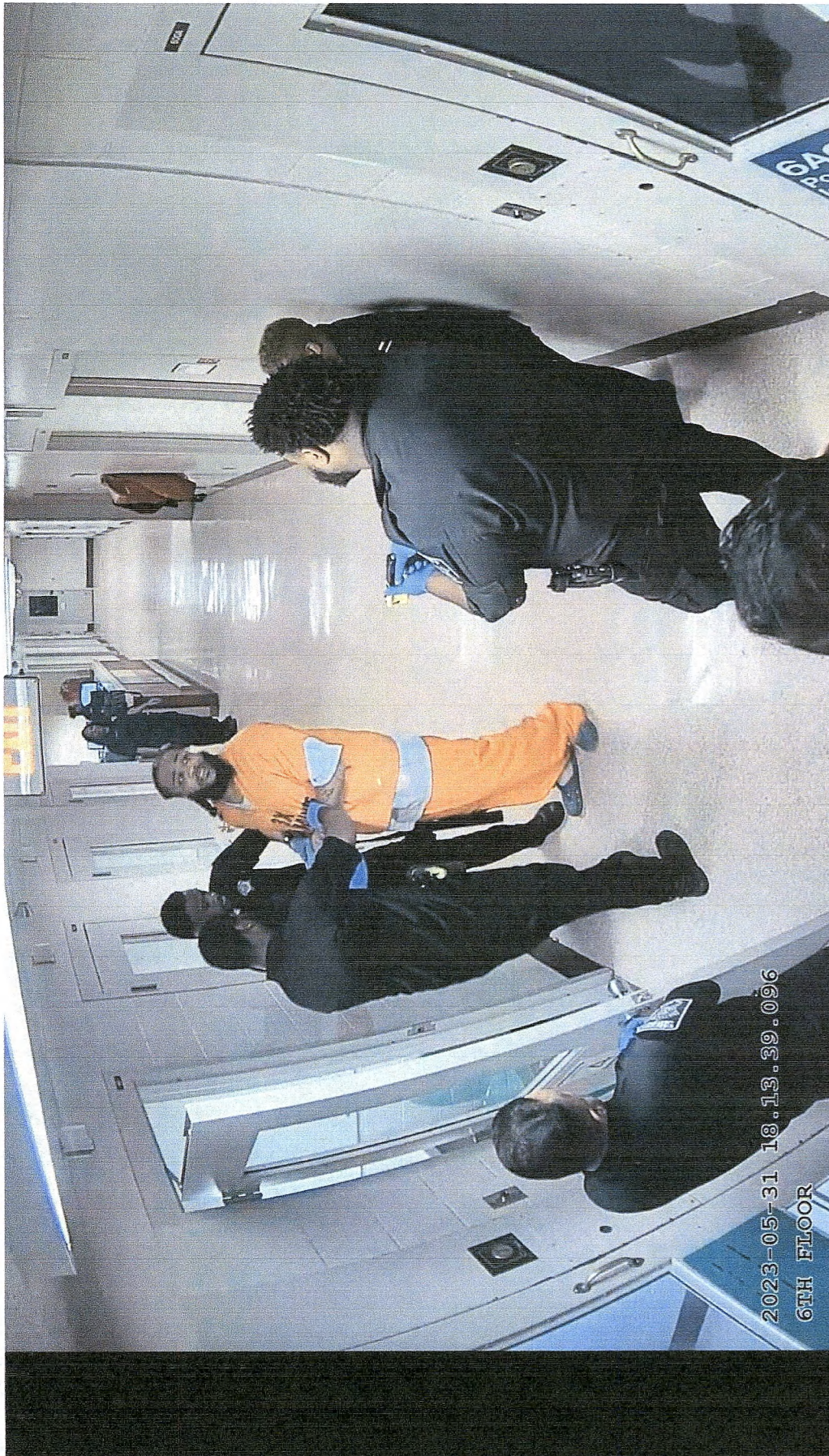


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